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11/1/11

## UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

MANUEL JESUS ROBLES

DEREK ANTHONY TINSLEY

NATASHA MICHELLE DASHER

UNITED STATES COURT OF  
SOUTHERN DISTRICT OF TEXAS

FILED

NOV 01 2011

CRIMINAL COMPLAINT

Case

11-1416m

(Name and Address of Defendant)

I, the undersigned complainant, state that the following is true and correct to the best of my knowledge and belief. On or about October 31, 2011 in Webb County, in the Southern District of Texas defendant(s) did,

(Date)

(Track Statutory Language of Offense)

conspire to knowingly, intentionally and unlawfully possess with the intent to distribute 5 kilograms or more of cocaine, a schedule II controlled substance,

in violation of 21 United States Code, 846, 841(a)(1)& (b)(1)(A).

I further state that I am a(n) Drug Enforcement Administration and that this complaint is based on the Official Title

facts related in the affidavit attached hereto and made a part of this complaint.

Signature of Complainant

James E. Gainer

Printed Name of Complainant

Sworn to before me and signed in my presence,

November 1, 2011

Date

at

Houston, Texas

City and State

Frances H. Stacy, United States Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**AFFIDAVIT**

I, Special Agent James Gainer, declare as follows:

I have been employed as a Special Agent with the Drug Enforcement Administration ("DEA") since 2009. I am currently assigned to the Houston, Texas DEA Field Office, where my responsibilities include investigating the trafficking of controlled substances.

I have been involved in numerous narcotic investigations, including undercover operations and the investigations of cocaine trafficking and the trafficking of other controlled substances. Based upon my personal participation in this investigation, and information provided to me by other law enforcement officers, I am familiar with the facts and circumstances referred to in this Affidavit. On the basis of that familiarity, I have determined the following:<sup>1</sup>

On the afternoon of October 31, 2011, I received information from a reliable Confidential Source ("the CS") that a tractor-trailer driven by **Manuel Jesus Robles** had traveled from Laredo, Texas with approximately 65 kilograms of cocaine inside, and that the tractor-trailer would be arriving in Fort Washington, Maryland later that same day, where it would be met by **Natasha Dasher**. According to the CS, **Dasher** was to receive the cocaine and provide **Robles** with payment for a prior shipment of cocaine. Information from the CS indicated that **Derek Tinsley** requested all 65 kilograms of the cocaine upon delivery in Maryland. The CS further confirmed that **Dasher** was to provide a portion of the cocaine to **Derek Tinsley**.

Acting on this information from the CS, members of law enforcement subsequently observed a tractor-trailer driven by **Robles** at a truck stop on Interstate 81, approximately 60 miles outside of the Washington D.C. metropolitan area. Members of law enforcement discreetly followed the tractor-trailer, which arrived at 1064 Livingston Road, Suite 106, Fort Washington, Maryland at approximately 4:30 p.m. Suite 106 is rented by **Natasha Dasher** (by her own subsequent admission).

Approximately one hour later, members of law enforcement observed **Dasher** arrive in a motor vehicle and park outside Suite 106. Shortly thereafter, members of law enforcement then received information from the CS that the cocaine was about to be unloaded. Upon receiving this information, members of law enforcement

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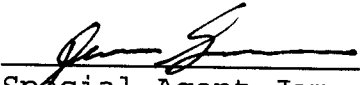
<sup>1</sup> This affidavit is a summary of pertinent information and does not contain every fact concerning this investigation known to me.

approached **Dasher**, who was inside her motor vehicle, and asked her to get out. **Dasher** confirmed that **Robles** was inside Suite 106, and provided members of law enforcement with a key to unlock Suite 106.

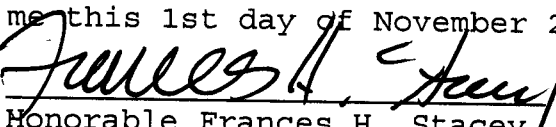
Members of law enforcement then opened Suite 106, called to **Robles**, and placed him in custody. During a routine security-sweep of Suite 106 immediately following the detention of **Robles**, members of law enforcement observed in plain view three large duffel bags containing United States currency. Additional currency was visible on top of the duffel bags, and was wrapped in heat-sealed plastic, with the number "40" written on the outside. The total amount of currency is approximately \$1.5 million.

A trained narcotics detection canine was called to the location, and gave a positive alert for the odor of narcotics on both the currency and the tractor-trailer. **Robles** then stated that 65 kilograms of cocaine could be found in the fuel tank of the tractor-trailer. Members of law enforcement subsequently searched the tractor-trailer and recovered approximately 65 kilograms of a mixture and substance containing cocaine from inside the fuel tank of the tractor-trailer (and which later field tested positive for the presence of cocaine).

Based on the above facts, your Affiant believes there is probable cause that **Manuel Jesus Robles, Derek Anthony Tinsley, and Natasha Michelle Dasher** did conspire to knowingly, intentionally, and unlawfully possess with the intent to distribute five (5) kilograms or more of cocaine, a schedule II controlled substance, in violation of Title 21, U.S.C., Sections 846, 841(a) (1) and (b) (1) (A) (ii).

  
Special Agent James Gainer  
Drug Enforcement Administration

Sworn to and subscribed before  
me this 1st day of November 2011.

  
Honorable Frances H. Stacey  
U.S. Magistrate Judge